

[Stipulating parties listed on signature page]

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION

MASTER FILE NO. 07-cv-5944 SC  
MDL NO. 1917

This Document Relates to: ALL INDIRECT  
PURCHASER ACTIONS

**STIPULATION AND ~~PROPOSED~~  
ORDER REGARDING PANASONIC  
DEFENDANTS' SUPPLEMENTAL  
RESPONSES TO INDIRECT  
PURCHASER PLAINTIFFS' FIRST SET  
OF INTERROGATORIES AND  
EXTENDING DEADLINE TO FILE  
MOTION TO COMPEL**

This Stipulation and Proposed Order between the Indirect-Purchaser Plaintiffs ( "IPPs") and Panasonic Corporation, f/k/a Matsushita Electric Industrial Co., Ltd. ("Panasonic Corp."), Panasonic Corporation of North America ("PNA"), and MT Picture Display Co., Ltd. ("MTPD") (collectively, "Panasonic Defendants") (together, the "Parties") is made with respect to the following facts and recitals:

WHEREAS, the IPPs and the Panasonic Defendants have met and conferred and have resolved all outstanding discovery issues with regard to IPPs' motion to compel supplemental responses from the Panasonic Defendants to IPPs' First Set of Interrogatories to all Defendants ("Interrogatories"), which was filed with the Special Master on September 12, 2014;

WHEREAS, the Panasonic Defendants have agreed to supplement their responses to

1 Interrogatory No. 7, as it relates to their affirmative defenses Nos. 21-41;

2 WHEREAS, Panasonic Defendants have also agreed to supplement their responses to  
3 Interrogatory Nos. 8, 9, 10, 11, 12, 15, 16, 18, 22, 23 and 24;

4 WHEREAS, the Panasonic Defendants agree to supplement their responses to the above-  
5 described Interrogatories by October 17, 2014;

6 WHEREAS, the Panasonic Defendants agree to extend the deadline by which the IPPs  
7 may file a motion to compel regarding the Panasonic Defendants' supplemental responses to the  
8 above-described Interrogatories to October 24, 2014; and

9 WHEREAS, the IPPs hereby withdraw their September 12, 2014 motion to compel  
10 supplemental interrogatory responses from the Panasonic Defendants.

11 **IT IS HEREBY STIPULATED AND AGREED** between the undersigned counsel that:

- 12 1. The Panasonic Defendants will serve supplemental responses to the IPPs' Interrogatory  
13 Nos. 7 (regarding affirmative defenses Nos. 21-41), 8, 9, 10, 11, 12, 15, 16, 18, 22, 23  
14 and 24, no later than October 17, 2014;
- 15 2. The IPPs may file a motion to compel regarding the Panasonic Defendants'  
16 supplemental responses to the IPPs' Interrogatory Nos. 7 (regarding affirmative  
17 defenses Nos. 21-41), 8, 9, 10, 11, 12, 15, 16, 18, 23 and 24, no later than October 24,  
18 2014; and
- 19 3. The IPPs withdraw their September 12, 2014 motion to compel supplemental  
20 interrogatory responses from the Panasonic Defendants.

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22 The undersigned Parties jointly and respectfully request that the Court enter this stipulation  
23 as an order.  
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1 Dated: September 26, 2014

TRUMP, ALIOTO, TRUMP & PRESCOTT LLP

2  
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11 *Lead Counsel for Indirect Purchaser Plaintiffs*

12 Dated: September 26, 2014

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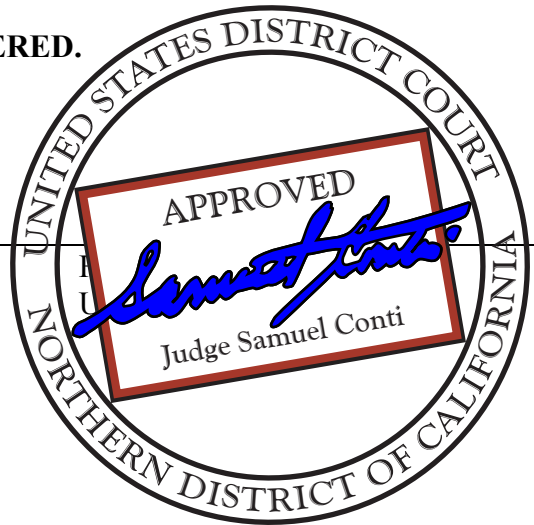
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(f/k/a Matsushita Electric Industrial Co., Ltd.),  
Panasonic Corporation of North America, and MT  
Picture Display Co., Ltd.*

1 PURSUANT TO STIPULATION, IT IS SO ORDERED.

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3  
4 Dated: October 22, 2014



**ECF CERTIFICATION**

Pursuant to Local Rule 5-1(i), the filer attests that the concurrence in the filing of this document has been obtained from each of the above signatories.

Dated: September 26, 2014

/s/ Lauren C. Capurro

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